

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Richard Wilbur Parisi

Case No. Case: 2:21-mj-30475  
Assigned To : Unassigned  
Assign. Date : 10/4/2021  
Description: CMP USA v SEALED  
MATTER (SO)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 5, 2020 and September 29, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 USC §§ 2252A(a)(5)(B) and 2252A(a)(2)

Possession, receipt, and distribution of child pornography

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

*Matthew M. Smith*

*Complainant's signature*

Matthew M. Smith, Special Agent (HSI)

*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: October 4, 2021

City and state: Detroit, Michigan

*Jonathan J.C. Grey*

*Judge's signature*

Jonathan J.C. Grey, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR CRIMINAL  
COMPLAINT AND ARREST WARRANT**

I, Matthew Smith, a special agent with U.S. Immigration and Customs Enforcement, Homeland Security Investigations, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I have been employed as a special agent (SA) with U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) since April 2015 and am assigned to the Cyber Group with HSI Detroit since September 2021. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through the HSI Special Agent Training Academy Program and everyday work related to conducting these types of investigations. I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) at the Federal Law Enforcement Training Center (FLETC), Advanced Computer Evidence Recovery Training (ACERT) at the HSI Cyber Crimes Center and the Cyber Crimes Center Mobile and Cellular Device Data Extraction course. I have received training in child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement

officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A, and I am authorized by law to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Richard Wilbur PARISI for violations of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(a)(2), which criminalize, among other thing, possession, receipt, and distribution of child pornography and other related materials.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Richard Wilbur PARISI.

4. Pursuant to the provisions of Title 18, United States Code, section 2256, “child pornography,” as used in this affidavit, includes any visual depiction, including any photograph, film, video, picture, or computer generated image or

picture of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct.

### **BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE**

5. On or about September 28, 2020, Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) Attaché London (ICE Attaché London) was contacted by the Metropolitan Police Department's Central Specialist Crime Unit ("Met. Police") regarding an Online Child Sexual Exploitation and Abuse (OCSEA) investigation that focused on individuals who utilized the Kik social media application to distribute and receive child sexual abuse material. In connection with the Met. Police's ongoing investigation, the Met. Police arrested a dual United States and United Kingdom citizen and advised ICE Attaché London that a large amount of the child sexual abuse files obtained from the arrestee's seized cellular device appeared to be first generation child sexual abuse material.

6. HSI Cyber Crimes Center (C3), Child Exploitation Investigations Unit (CEIU) has agreed to participate in "Operation Siberium" to provide assistance to ICE Attaché London and the Met. Police with the ongoing investigation. The collaborative efforts aim to identify and locate the minor victims in the child sexual abuse files, as well as identify and locate the distributors, producers, and contact offenders who are members of the identified Kik social media group(s).

## **PROBABLE CAUSE**

7. HSI's Cyber Crimes Center (C3) provided the Kik chats to me and I reviewed them. These Kik chats included numerous members who would post images of child pornography for other members to see. Below are several examples of images posted by the user sharxia1\*\*\*\*@talk.Kik.com ("Sharxia1").

8. On August 5, 2020, Sharxia1 posted six images that contained child pornography in the Kik group. Those files were:

- a. A preview image of a video file depicting a minor age female approximately 7-10 years of age fully nude touching what appears to be a purple toy to her vagina.
- b. A preview image of a video file depicting a minor age female approximately 10-12 years of age wearing a black mask gripping an adult penis in her right hand.
- c. An image of a minor female aged approximately 7-9 years old gripping an adult penis in her left hand.
- d. An image of a minor age female approximately 10-12 years of age outside on her hands and knees in what appears to be a culvert. The minor age female is wearing a grey sleeveless top and has her multi-colored skirt pulled up showing her underwear around her ankles. The position of the minor age female exposes the female's anus and vagina. Sharxia1 accompanied that image with the comment "I want this".

- e. A preview image of a video file depicting a minor age female approximately 10-12 years of age fully nude laying down on a couch with an adult penis inserted into her vagina.
- f. A preview image of a video file depicting a minor age female approximately 9-11 years of age fully nude laying down while a male performs oral sex on her.

9. An investigation using the IP address and other information determined that the owner of the Kik account which contained the above-referenced child pornography was Richard PARISI and I obtained a search warrant for his residence. On September 29, 2021, personnel from HSI Detroit executed a federal search warrant at \*\*\*\*\*, Warren, MI where Richard PARISI was encountered at the residence at that time and detained. PARISI refused to speak with law enforcement without a lawyer present.

10. A total of eight electronic devices were seized as a result of the search warrant. During a forensic preview of the items, a device named “Rich’s iPhone” contained numerous images of confirmed child pornography. The name “Rich Parisi” was listed as the owner of the phone and the email address associated with the phone was “parisirw@\*\*\*\*\*”. The email address parisirw@\*\*\*\*\* was also associated with the Kik account that shared the child pornography images on August 5, 2020. Some of the images found on “Rich’s iPhone” are described as:

- a. An image depicting a minor age female approximately 7-9 years of age fully nude laying down with an adult penis that appears to be inserted into her vagina.
- b. An image depicting a minor age female approximately 7-9 years of age fully nude on the floor with her fingers touching her vagina.
- c. An image depicting a minor age female approximately 7-9 years of age standing in front of a fully nude adult male. The minor age female has the adult male's penis in her mouth.

### CONCLUSION

11. I respectfully submit that there is probable cause to believe that Richard Wilbur PARISI violated Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(a)(2), which criminalize, among other things, the possession, receipt, and distribution of child pornography and other related materials.

12. Wherefore by this affidavit and application, I request that the Court authorize the issuance of a criminal complaint and arrest warrant for Richard Wilbur PARISI.

Respectfully submitted,

Matthew M. Smith  
Matthew M. Smith, Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in black ink, reading "Jonathan J.C. Grey", is positioned above a horizontal line.

HON. JONATHAN J.C. GREY  
UNITED STATES MAGISTRATE JUDGE

Date: October 4, 2021